

**IN THE DISTRICT COURT OF THE UNITED STATES  
FOR THE EASTERN DISTRICT OF OKLAHOMA**

**GREAT LAKES INSURANCE SE,** )  
 )  
 **Plaintiff,** )  
 ) **Case No. 6:23-CV-00052-JAR**  
 **vs.** )  
 )  
 **WAGNER & LYNCH, PLLC,** )  
 )  
 **Defendant.** )

**PLAINTIFF GREAT LAKES INSURANCE SE'S  
PRELIMINARY EXHIBIT LIST**

Pursuant to the Court’s Scheduling Order dated March 21, 2023 (Dkt. # 15), Plaintiff Great Lakes Insurance SE respectfully submits the Preliminary Exhibit List. Discovery in this case is ongoing, and Plaintiff reserves the right to supplement this list as discovery and further investigation may develop.

## PRELIMINARY EXHIBIT LIST

No.	Description
1.	Great Lakes' claim file and related documents
2.	Subject to objection, documents produced by Defendant
3.	Superior Plumbing file, including investigation documents, reports, photographs, invoices, and statements
4.	Flood Serv file, including investigation documents, reports, photographs, invoices, and statements
5.	Subject to objection, records produced pursuant to any Subpoena Duces Tecum
6.	All documents relied upon by any expert including any opinion reports produced to the extent Plaintiff does not object.
7.	Subject to objection, all documents produced by Defendant during the course of discovery.
8.	Subject to objection, all discovery responses including interrogatories and admissions.
9.	Subject to objection, all exhibits listed by Defendant.

10.	Subject to objection, demonstrative illustrations, exemplars, photographs, charts, models and diagrams related to the facts or analysis of matters related to the allegations in this matter, including the scene or site that is the subject of this litigation.
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DOERNER, SAUNDERS, DANIEL  
& ANDERSON, L.L.P.

By: s/ Alexandra J. Gage  
Alexandra J. Gage, OBA No. 33874  
Michael S. Linscott, OBA No. 17266  
Two West Second Street, Suite 700  
Tulsa, OK 74103-3117  
Telephone 918.591.5271  
Facsimile 918.925.5271

*Attorneys for Plaintiff Great Lakes Insurance SE*

**CERTIFICATE OF SERVICE**

I hereby certify that on the 5<sup>th</sup> day of May, 2023, I electronically transmitted the foregoing document to the Clerk of Court using the ECF System for filing and transmittal of a Notice of Electronic Filing to the following ECF registrants:

[Wes.foundationlaw@gmail.com](mailto:Wes.foundationlaw@gmail.com)

s/ Alexandra J. Gage

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